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8 Mountain View, California 94040
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11 Attorneys for Defendant
12 Raj Abhyanker

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

16 NEXTDOOR.COM, INC.,
17 Plaintiff,
18 vs.
19 RAJ ABHYANKER,
20 Defendant.

Case No. 3:12-cv-05667-EMC

**UPDATED PRIVILEGE LOG IN
RESPONSE TO JUDGE COUSINS'
AUGUST 18, 2014 ORDER (ECF NO. 313).**

Courtroom: A – 15th Floor
Discovery Judge: Hon. Nathanael Cousins

1 Enclosed please find the ordered updated privilege log in response to the Honorable Judge
2 Cousins' August 18, 2014 Order (ECF No. 313).

3
4 Dated August 25, 2014

Respectfully submitted,

5 LEGALFORCE RAJ ABHYANKER, P.C.

6
7 By /s/David Lavine

David Lavine

8 Attorneys for Defendant

9 Raj Abhyanker

Doc #	Date	Email From if applicable	Email To if applicable	Email CC if applicable	Other's sent or received and/or furnished/informed of substance, or in an email forwarded in the chain, if applicable	Privilege or Protection	Description
1	2/5/2014	Heather Norton <heather@legalforce.law.com>	Chancellor Tseng <chance@legalforce.law.com>	Raj Abhyanker <raj@trademarkia.com>; Dongxia Liu <dongxia@rajpatent.com>; Bruno Tarabichi <bruno@legalforce.law.com>; Andrew Kramer <andrew@legalforce.law.com>	T R Coca <rcoca@scglobal.net>	Work Product; Attorney/Client	Email reflecting legal advice of counsel regarding litigation strategy. Specifically, Mr. Abhyanker's Attorney Heather Norton is inquiring as to certain dates for a particular court hearing.
2	6/12/2014	Chancellor Tseng <chance@legalforce.law.com>	Sarah Goll <Sarah@legalforce.law.com>; Raj Abhyanker <raj@legalforce.law.com>; Raj Abhyanker <rabyanker@icloud.com>		Scott Allen <scott@legalforce.law.com>; Heather Norton <heather@legalforce.law.com>; Bruno Tarabichi <bruno@legalforce.law.com>; Brian Orion <brian@legalforce.law.com>; Roy Montgomery <roy@legalforce.law.com>; Ilana Rubel <lrubel@fenwick.com>; Laurence Pulgram <lpulgram@fenwick.com>; Guinevere Jobson <gjobson@fenwick.com>; Jennifer Kelly <JKelly@fenwick.com>	Work Product; Attorney/Client	Email with attachments reflecting legal advice of counsel regarding draft of joint discovery letter. Specifically, Mr. Allen had forwarded a draft version from Ms. Ilana Rubel (nextdoor.com counsel) to others on Mr. Abhyanker's legal team without sending it to Mr. Abhyanker, the email was then forwarded to Mr. Abhyanker via Ms Goll and Mr. Tseng.
3	3/18/2013	Krithika <krithika.dn@gmail.com>	Raj Abhyanker <rabyanker@icloud.com>			Work Product; Attorney/Client	Email seeking and reflecting legal advice of counsel regarding trade secrets. Specifically, an email chain between Mr. Abhyanker and potential advisor and consultant on the Nextdoor case regarding the trade secret designation and strategy.
4	3/18/2013	Krithika <krithika.dn@gmail.com>	Raj Abhyanker <rabyanker@icloud.com>	Bruno Tarabichi <bruno@legalforce.law.com>		Work Product; Attorney/Client	Email seeking and reflecting legal advice of counsel regarding trade secrets. Specifically, an email chain between Mr. Abhyanker and potential advisor and consultant on the Nextdoor case regarding the trade secret designation and strategy.
5	8/13/2013	Raj Abhyanker <rabyanker@icloud.com>	Raj Abhyanker <rabyanker@icloud.com>			Work Product; Attorney/Client	Proposed deposition questions order by and intended for Abhyanker litigation team.
6	8/27/2013	Mitesh Patel <mtesh@legalforce.law.com>	Raj Abhyanker <rabyanker@icloud.com>	randall morrison <rdmlaw087@gmail.com>; Steven Fichera <steven@legalforce.law.com>; Bruno Tarabichi <bruno@legalforce.law.com>		Work Product; Attorney/Client	Email seeking and reflecting legal advice of counsel regarding copyright filing. Specifically, Mr. Abhyanker is requesting that Mr. Fichera file a copyright on his behalf for his Fatdoor marketing video, and asking advice regarding whether this video is similar enough to the Nextdoor marketing video for a claim by Mr. Abhyanker against Nextdoor for copyright infringement.
7	8/27/2013	Mitesh Patel <mtesh@legalforce.law.com>	Raj Abhyanker <rabyanker@icloud.com>	randall morrison <rdmlaw087@gmail.com>; Steven Fichera <steven@legalforce.law.com>; Bruno Tarabichi <bruno@legalforce.law.com>		Work Product; Attorney/Client	Email seeking and reflecting legal advice of counsel regarding copyright filing. Specifically, Mr. Abhyanker is requesting that Mr. Fichera file a copyright on his behalf for his Fatdoor marketing video, and asking advice regarding whether this video is similar enough to the Nextdoor marketing video for a claim by Mr. Abhyanker against Nextdoor for copyright infringement.
8							Produced August 3, 2014
9	12/21/2013	Raj Abhyanker <raj@legalforce.law.com>	Raj Abhyanker <rabyanker@icloud.com>		Bruno Tarabichi; Heather Norton <heather@legalforce.law.com>; Chancellor Tseng (Abhyanker Personal Assistant)	Work Product; Attorney/Client	Email with attachment reflecting legal advice of counsel regarding draft of initial disclosures. Specifically, Mr. Abhyanker forwarded an email by Mr. Tarabichi to himself in regards to draft initial disclosures for his review.
10							Non-responsive - Item removed because it relates to another legal matter.
11							Produced August 3, 2014
12	1/23/2014	Raj Abhyanker <raj@legalforce.law.com>	Raj Abhyanker <rabyanker@icloud.com>		Bruno Tarabichi <bruno@legalforce.law.com>; Heather Norton <heather@legalforce.law.com>; Chancellor Tseng (Abhyanker Personal Assistant)	Attorney/Client; Work Product	Email with attachment seeking and reflecting legal advice of counsel regarding draft declaration. Specifically, an email intended for Abhyanker counsel Bruno Tarabichi inquiring as to whether changes need to be made to a declaration.
13	3/8/2014	Dongxia Liu <dongxia@rajpatent.com>	Raj Abhyanker <rabyanker@icloud.com>			Work Product	Email with attachment seeking and reflecting legal advice of counsel regarding draft declaration. Specifically, an email intended for Abhyanker counsel Bruno Tarabichi inquiring as to whether changes need to be made to a declaration.
14	3/8/2014	Dongxia Liu <dongxia@rajpatent.com>	Raj Abhyanker <rabyanker@icloud.com>			Work Product	Email with attachment seeking and reflecting legal advice of counsel regarding draft declaration. Specifically, an email intended for Abhyanker counsel Bruno Tarabichi inquiring as to whether changes need to be made to a declaration.
15	5/4/2014	Raj Abhyanker <rabyanker@icloud.com>	Raj Abhyanker <raj@legalforce.law.com>			Work Product	Email reflecting legal advice of counsel regarding State Bar complaint. Specifically, an email intended for Abhyanker counsel regarding points to add to a proposed state bar complaint.
16	5/5/2014	Raj Abhyanker <rabyanker@icloud.com>	Raj Abhyanker <raj@legalforce.law.com>			Attorney/Client	Email reflecting legal advice of counsel regarding State Bar complaint. Specifically, an email to Abhyanker counsel, forwarded by Abhyanker to himself regarding points to add to a proposed state bar complaint.
17	5/31/2014	Raj Abhyanker <rabyanker@icloud.com>	Sonal Abhyanker <sabyanker@gmail.com>			Marital Privilege	Email regarding trade secrets. Specifically an email from Abhyanker to his spouse.
	3/18/2013	Raj Abhyanker <rabyanker@icloud.com>	clifford@legalforce.law.com;			Attorney/Client	Email seeking and reflecting legal advice of counsel regarding trade secrets. Specifically, an email chain between Mr. Abhyanker and potential advisor and consultant on the Nextdoor case regarding the trade secret designation and strategy. Email was forwarded to Abhyanker firm's controller since he would have to make the decision regarding hiring this individual.
19	3/18/2013	Raj Abhyanker <rabyanker@icloud.com>	Krithika <krithika.dn@gmail.com>; Bruno Tarabichi <bruno@legalforce.law.com>			Attorney/Client	Email seeking and reflecting legal advice of counsel regarding trade secrets. Specifically, an email chain between Mr. Abhyanker and potential advisor and consultant on the Nextdoor case regarding the trade secret designation and strategy. Email was forwarded to Abhyanker counsel Bruno Tarabichi.
20	3/18/2013	Raj Abhyanker <rabyanker@icloud.com>	Krithika <krithika.dn@gmail.com>	Bruno Tarabichi <bruno@legalforce.law.com>		Attorney/Client	Email seeking and reflecting legal advice of counsel regarding trade secrets. Specifically, an email chain between Mr. Abhyanker and potential advisor and consultant on the Nextdoor case regarding the trade secret designation and strategy.
21	3/26/2013	Raj Abhyanker <rabyanker@icloud.com>	Raj Abhyanker <raj@legalforce.law.com>; Ravi Soni <ravi@legalforce.law.com>			Work Product; Attorney/Client	Email seeking legal advice of counsel regarding deposition preparation. Specifically, in an email intended for Abhyanker counsel, Mr. Abhyanker is proposing potential deposition questions for Nextdoor.com
22							Produced August 3, 2014
23	4/7/2013	Raj Abhyanker <rabyanker@icloud.com>	Raj Abhyanker <raj@legalforce.law.com>			Work Product; Attorney/Client	Email seeking and reflecting legal advice of counsel regarding draft complaint. Specifically, an email intended for Abhyanker counsel in regards to facts and claims.

24	8/2/2013	Raj Abhyanker <rabhyanker@icloud.com>	Raj Abhyanker <raj@legalforcelaw.com>			Work Product; Attorney/Client	Email seeking and reflecting legal advice of counsel regarding proposed settlement terms. Specifically, an email intended for Abhyanker counsel in regards to potential acceptable terms.
25	10/7/2013	Raj Abhyanker <rabhyanker@icloud.com>	Raj Abhyanker <raj@legalforcelaw.com>			Work Product; Attorney/Client	Email seeking and reflecting legal advice of counsel regarding standing. Specifically, an email intended for Abhyanker litigation team regarding standing.
26							Produced August 3, 2014
27	10/28/2013	Raj Abhyanker <rabhyanker@icloud.com>	Raj Abhyanker <raj@legalforcelaw.com>			Work Product	Email reflecting legal advice of counsel regarding litigation strategy. Specifically, an email intended for Abhyanker counsel regarding potential interrogatories.
28							Produced August 3, 2014
29							Produced August 3, 2014
30	11/14/2013	Raj Abhyanker <rabhyanker@icloud.com>	Anthony C. Meredith, Esq. <meredithlaw@yahoo.com>; Thomas H. Kawai <kawai@kawaiilaw.com>; Thomas H. Kawai <kawai@legalforcelaw.com>; Raj Abhyanker <raj@legalforcelaw.com>			Work Product; Attorney/Client	Email reflecting legal advice of counsel regarding litigation strategy. Specifically a Cease and Desist letter intended for Nextdoor.com.
31	1/23/2014	Raj Abhyanker <rabhyanker@icloud.com>	Sonal Abhyanker <sabhyanker@gmail.com>	Chancelor Tseng (Abhyanker Personal Assistant)	Marital Privilege		Email regarding litigation strategy. Sent by Abhyanker to his Spouse.
32	3/8/2014	Raj Abhyanker <rabhyanker@icloud.com>	Dongxia Liu <dongxia@rajpatent.com>	Chancelor Tseng (Abhyanker Personal Assistant)	Work Product		Email with attachment seeking and reflecting legal advice of counsel regarding draft declaration. Specifically, an email intended for Abhyanker counsel Bruno Tarabichi inquiring as to whether changes need to be made to a declaration.
33	3/8/2014	Raj Abhyanker <rabhyanker@icloud.com>	Dongxia Liu <dongxia@rajpatent.com>	Chancelor Tseng (Abhyanker Personal Assistant)	Work Product		Email with attachment seeking and reflecting legal advice of counsel regarding draft declaration. Specifically, an email intended for Abhyanker counsel Bruno Tarabichi inquiring as to whether changes need to be made to a declaration.
34	11/18/2013	Raj Abhyanker <raj@fatdoor.com>			Work Product		Draft email intended for Abhyanker counsel regarding discovery and litigation strategy.
35	11/20/2013	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client		Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically regarding potential settlement.
36	11/20/2013	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client		Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically, a statement addressing settlement.
37							Produced August 3, 2014
38							Produced August 3, 2014
39	12/12/2013	Raj Abhyanker <raj@fatdoor.com>			Work Product; Attorney/Client		Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically issues related to trade secrets.
40	12/12/2013	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client		Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically issues related to trade secrets.
41	12/13/2013	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client		Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically issues related to trade secrets.
42	12/13/2013	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client		Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically issues related to trade secrets.
43	12/13/2013	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client		Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically issues related to trade secrets.
44	12/13/2013	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client		Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically issues related to trade secrets.
45	12/13/2013	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client		Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically issues related to trade secrets.
46	12/18/2013	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client		Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically issues related to trade secrets.
47	12/18/2013	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client		Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically issues related to trade secrets.
48	12/18/2013	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client		Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically issues related to trade secrets.
49	12/20/2013	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client		Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically, a timeline of events.
50	3/21/2014	Administrator [FatDoor] <raj@fatdoor.com>	Matthew Powers <mattthew.powers@tensegritylawgroup.com>		Work Product; Attorney/Client		Email reflecting legal advice of counsel regarding litigation strategy. Specifically, Abhyanker discussing with potential counsel in this case the history and procedural background of the different court actions.
51	3/21/2014	Administrator [FatDoor] <raj@fatdoor.com>	Matthew Powers <mattthew.powers@tensegritylawgroup.com>		Work Product; Attorney/Client		Email reflecting legal advice of counsel regarding litigation strategy. Specifically, Abhyanker discussing with potential counsel strategy regarding the case.
52	3/25/2014	Raj Abhyanker <raj@fatdoor.com>	Venkat Balasubramani <venkat@focallaw.com>		Work Product; Attorney/Client		Email reflecting legal advice of counsel regarding litigation strategy. Specifically, Abhyanker discussing with potential counsel in this case the history and procedural background of the different court actions.
53	3/28/2014	Raj Abhyanker <raj@fatdoor.com>	Venkat Balasubramani <venkat@focallaw.com>		Attorney/Client		Email reflecting legal advice of counsel regarding litigation strategy. Specifically, Abhyanker discussing with potential counsel in this case the history and procedural background of the different court actions.
54	3/29/2014	Raj Abhyanker <raj@fatdoor.com>	angela@legalforce.com; Roy Montgomery <roy@legalforcelaw.com>; Peter Jensen-Haxel <peter@legalforcelaw.com>; Mitesh Patel <mitiesh@legalforcelaw.com>; Kuscha Hatami <kuscha@legalforcelaw.com>; Dongxia Liu <dongxia@rajpatent.com>; Andrew Kramer <andrew@legalforcelaw.com>		Work Product; Attorney/Client		Email reflecting legal advice of counsel regarding litigation strategy. Specifically an email intended for Heather Norton in regards to Nextdoor's use of a certain curve algorithm.
55	3/29/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client		Email reflecting legal advice of counsel regarding litigation strategy. Specifically an email intended for Heather Norton and Scott Allen in regards to Nextdoor's use of a certain curve algorithm.
56	3/29/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client		Email reflecting legal advice of counsel regarding litigation strategy. Specifically an email intended for Heather Norton and Scott Allen in regards to Nextdoor's use of a certain curve algorithm.
57	3/29/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client		Email reflecting legal advice of counsel regarding litigation strategy. Specifically an email intended for Heather Norton and Scott Allen in regards to Nextdoor's use of a certain curve algorithm.
58	3/29/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client		Email reflecting legal advice of counsel regarding litigation strategy. Specifically an email intended for Heather Norton and Scott Allen in regards to Nextdoor's use of a certain curve algorithm.

59	3/29/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client	Email reflecting legal advice of counsel regarding litigation strategy. Specifically an email intended for Heather Norton and Scott Allen in regards to Nextdoor's use of a certain curve algorithm.
60	3/29/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client	Email reflecting legal advice of counsel regarding litigation strategy. Specifically an email intended for Heather Norton and Scott Allen in regards to Nextdoor's use of a certain curve algorithm.
61	3/29/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client	Email reflecting legal advice of counsel regarding litigation strategy. Specifically an email intended for Heather Norton and Scott Allen in regards to Nextdoor's use of a certain curve algorithm.
62	3/29/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client	Email reflecting legal advice of counsel regarding litigation strategy. Specifically an email intended for Heather Norton and Scott Allen in regards to Nextdoor's use of a certain curve algorithm.
63	3/29/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client	Email reflecting legal advice of counsel regarding litigation strategy. Specifically an email intended for Heather Norton and Scott Allen in regards to Nextdoor's use of a certain curve algorithm.
64	4/4/2014	Administrator [FatDoor] <raj@fatdoor.com>	angela@legalforce.com; Andrew Kramer <andrew@legalforce.com>		Work Product; Attorney/Client	Email reflecting legal advice of counsel regarding litigation strategy. Specifically an email intended for legal team and patent agent regarding claim charts for map based patent application.
65	4/14/2014	Raj Abhyanker <raj@fatdoor.com>			Work Product; Attorney/Client	Draft Email seeking legal advice of counsel regarding litigation strategy. Specifically, email intended for Abhyanker legal team in regards to the timeline of events leading up to litigation.
66						Produced August 3, 2014
67	4/24/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client	Draft Email seeking legal advice of counsel regarding litigation strategy. Specifically email intended for Abhyanker counsel regarding cybersquatting .
68	5/2/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client	Draft Email seeking legal advice of counsel regarding litigation strategy. Specifically email intended for Abhyanker counsel regarding cybersquatting .
69	5/2/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client	Draft Email seeking legal advice of counsel regarding litigation strategy. Specifically email intended for Abhyanker counsel regarding cybersquatting .
70	5/2/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client	Draft Email seeking legal advice of counsel regarding litigation strategy. Specifically email intended for Abhyanker counsel regarding cybersquatting .
71	5/2/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client	Draft Email seeking legal advice of counsel regarding litigation strategy. Specifically email intended for Abhyanker counsel regarding cybersquatting .
72	5/2/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client	Draft Email seeking legal advice of counsel regarding litigation strategy. Specifically email intended for Abhyanker counsel regarding cybersquatting .
73	5/2/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client	Draft Email seeking legal advice of counsel regarding litigation strategy. Specifically, email intended for Abhyanker Counsel regarding trade secrets.
74	5/3/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client	Draft Email seeking legal advice of counsel regarding litigation strategy. Specifically, email intended for Abhyanker Counsel regarding trade secrets.
75	5/3/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client	Draft Email seeking legal advice of counsel regarding litigation strategy. Specifically, email intended for Abhyanker Counsel regarding trade secrets.
76	5/3/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client	Draft Email seeking legal advice of counsel regarding litigation strategy. Specifically, email intended for Abhyanker Counsel regarding trade secrets.
77	5/5/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client	Draft Email seeking legal advice of counsel regarding litigation strategy. Specifically, email intended for Abhyanker Counsel regarding trade secrets and potential witnesses.
78	5/9/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client	Draft Email seeking legal advice of counsel regarding litigation strategy. Specifically, email intended for Abhyanker Counsel regarding trade secrets.
79	5/13/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client	Draft Email seeking legal advice of counsel regarding litigation strategy. Specifically, email for Abhyanker counsel regarding an updated Cease and Desist notice.
80	5/20/2014	Raj <raj@fatdoor.com>			Attorney/Client	Draft Email seeking legal advice of counsel regarding litigation and discovery. Specifically, email intended for Heather Norton in regards to her interrogatory responses.
81	5/28/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client	Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically, email intended for Abhyanker counsel with proposed deposition questions.
82	5/28/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client	Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically, email intended for Abhyanker counsel with proposed deposition questions.
83	5/28/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client	Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically, email intended for Abhyanker counsel with proposed deposition questions.
84	5/28/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client	Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically, email intended for Abhyanker counsel with proposed deposition questions.
85	5/28/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client	Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically, email intended for Abhyanker counsel with proposed deposition questions.
86	5/28/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client	Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically, email intended for Abhyanker counsel with proposed deposition questions.
87	5/28/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client	Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically, email intended for Abhyanker counsel with proposed deposition questions.
88	5/28/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client	Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically, email intended for Abhyanker counsel with proposed deposition questions.
89	6/7/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client	Draft Email reflecting legal advice of counsel regarding current litigation strategy. Specifically an email intended for Abhyanker counsel regarding standing and counter claims.
90	6/7/2014	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client	Draft Email reflecting legal advice of counsel regarding current litigation strategy. Specifically an email intended for Abhyanker counsel regarding standing and counter claims.

91	6/7/2014	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft Email reflecting legal advice of counsel regarding current litigation strategy. Specifically an email intended for Abhyanker counsel regarding standing and counter claims.
92	6/7/2014	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft Email reflecting legal advice of counsel regarding current litigation strategy. Specifically an email intended for Abhyanker counsel regarding standing and counter claims.
93	6/7/2014	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft Email reflecting legal advice of counsel regarding current litigation strategy. Specifically an email intended for Abhyanker counsel regarding standing and counter claims.
94	6/7/2014	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft Email reflecting legal advice of counsel regarding current litigation strategy. Specifically an email intended for Abhyanker counsel regarding standing and counter claims.
95	6/7/2014	Raj Abhyanker <raj@legalforcetlaw.com>	Raj Abhyanker <raj@fatdoor.com>			Work Product	Draft Email reflecting legal advice of counsel regarding current litigation strategy. Specifically an email intended for Abhyanker counsel regarding standing and counter claims.
96	6/7/2014	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft Email reflecting legal advice of counsel regarding current litigation strategy. Specifically an email intended for Abhyanker counsel regarding standing and counter claims.
97	6/7/2014	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically issues related to trade secrets.
98	6/7/2014	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically issues related to trade secrets.
99	6/7/2014	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically issues related to trade secrets.
100	6/7/2014	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically issues related to trade secrets.
101	6/8/2014	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically issues related to trade secrets.
102	6/8/2014	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically issues related to trade secrets.
103	6/8/2014	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft Email reflecting legal advice of counsel regarding current litigation strategy. Specifically an email intended for Abhyanker counsel regarding standing and counter claims.
104	6/8/2014	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft Email reflecting legal advice of counsel regarding current litigation strategy. Specifically an email intended for Abhyanker counsel regarding standing and counter claims.
105	6/8/2014	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft Email reflecting legal advice of counsel regarding current litigation strategy. Specifically an email intended for Abhyanker counsel regarding standing and counter claims.
106	6/8/2014	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft Email reflecting legal advice of counsel regarding current litigation strategy. Specifically an email intended for Abhyanker counsel regarding standing and counter claims.
107	6/8/2014	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft Email reflecting legal advice of counsel regarding current litigation strategy. Specifically an email intended for Abhyanker counsel regarding standing and counter claims.
108	6/7/2014	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft Email reflecting legal advice of counsel regarding current litigation strategy. Specifically an email intended for Abhyanker counsel regarding standing and counter claims.
109							Produced August 3, 2014
110							Produced August 3, 2014
111							Produced August 3, 2014
112	3/25/2014	Venkat Balasubramani <venkat@focallaw.com>	Raj Abhyanker <raj@fatdoor.com>			Attorney/Client	Email reflecting legal advice of counsel regarding litigation strategy. Specifically, Abhyanker discussing with potential counsel in this case the history and procedural background of the different court actions.
113	6/14/2014	Raj Abhyanker <raj@legalforcetlaw.com>	Raj Abhyanker <raj@fatdoor.com>	Chancellor Tseng (Abhyanker Personal Assistant)		Attorney/Client	Email reflecting legal advice of counsel regarding litigation strategy. Specifically an email intended for Abhyanker legal team in regards to draft declarations.
114	6/14/2014	Raj Abhyanker <raj@legalforcetlaw.com>	Raj Abhyanker <raj@fatdoor.com>			Work Product	Email reflecting legal advice of counsel regarding litigation strategy. Specifically an email intended for Abhyanker legal team in regards to draft declarations.
115	11/18/2013	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft Email reflecting legal advice of counsel regarding current litigation strategy. Specifically an email intended for Abhyanker counsel regarding Center'd.
116	11/20/2013	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft Email reflecting legal advice of counsel regarding current litigation strategy. Specifically an email intended for Abhyanker counsel regarding settlement.
117	11/24/2013	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft Email reflecting legal advice of counsel regarding current litigation strategy. Specifically an email intended for Abhyanker counsel regarding potential deposition questions.
118	12/6/2013	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically issues related to trade secrets.
119	12/12/2013	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically issues related to trade secrets.
120	12/13/2013	Raj Abhyanker <raj@fatdoor.com>				Work Product; Attorney/Client	Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically issues related to trade secrets.
121	12/18/2013	Raj Abhyanker <raj@fatdoor.com>				Work Product; Attorney/Client	Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically issues related to trade secrets.
122	12/20/2013	Raj Abhyanker <raj@fatdoor.com>				Work Product; Attorney/Client	Draft email intended for Abhyanker counsel regarding litigation strategy. Specifically issues related to Abhyanker use of the mark prior to Nextdoor.com
123	3/29/2014	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically issues related to trade secrets.
124	4/14/2014	Raj Abhyanker <raj@fatdoor.com>				Work Product; Attorney/Client	Draft Email seeking legal advice of counsel regarding litigation strategy. Specifically, email intended for Abhyanker legal team in regards to the timeline of events leading up to litigation.

125	4/24/2014	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft Email seeking legal advice of counsel regarding litigation strategy. Specifically, email intended for Abhyanker legal team in regards to cyberpiracy.
126	4/24/2014	Raj <raj@fatdoor.com>				Attorney/Client	Draft Email seeking legal advice of counsel regarding litigation strategy. Specifically, email intended for Abhyanker legal team in regards to the timeline of events leading up to litigation.
127	5/2/2014	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft Email seeking legal advice of counsel regarding litigation strategy. Specifically, email intended for Abhyanker legal team in regards to cyberpiracy.
128	5/2/2014	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically issues related to trade secrets.
129	5/3/2014	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft email intended for Abhyanker counsel regarding discovery and litigation strategy. Specifically issues related to state bar complaint.
130	5/5/2014	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft Email seeking legal advice of counsel regarding litigation strategy. Specifically, email intended for Abhyanker Counsel regarding trade secrets and potential witnesses.
131	5/13/2014	Raj Abhyanker <raj@fatdoor.com>				Work Product; Attorney/Client	Email reflecting legal advice of counsel regarding litigation strategy. Specifically, an email intended for Abhyanker counsel regarding cease and desist notice.
132	5/20/2014	Raj <raj@fatdoor.com>				Attorney/Client	Email reflecting legal advice of counsel regarding litigation strategy. Specifically, an email intended for Abhyanker counsel regarding correcting interrogatory responses.
133	5/28/2014	Raj Abhyanker <raj@fatdoor.com>				Work Product; Attorney/Client	Email reflecting legal advice of counsel regarding litigation strategy. Specifically, an email intended for Abhyanker counsel regarding correcting interrogatory responses.
134	5/30/2014	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft email intended for Abhyanker previous counsel, requesting files.
135	6/1/2014	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft Email seeking legal advice of counsel regarding litigation strategy.
136	6/5/2014	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Email seeking legal advice of counsel regarding deposition preparation. Specifically, in an email intended for Abhyanker counsel, Mr. Abhyanker is proposing potential RFP requests.
137	6/7/2014	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft Email reflecting legal advice of counsel regarding current litigation strategy. Specifically an email intended for Abhyanker counsel regarding standing and counter claims.
138	6/7/2014	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft Email seeking legal advice of counsel regarding litigation strategy. Specifically, email intended for Abhyanker Counsel regarding trade secrets.
139	6/8/2014	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft Email seeking legal advice of counsel regarding litigation strategy. Specifically, email intended for Abhyanker Counsel regarding Bad Faith.
140	6/8/2014	Raj Abhyanker <raj@fatdoor.com>				Attorney/Client	Draft Email seeking legal advice of counsel regarding litigation strategy. Specifically, email intended for Abhyanker Counsel regarding Bad Faith.
141	12/5/2011	Ashwin Anand <ashwin@rajpatent.com>	Raj Abhyanker <raj@rajpatent.com>	jessica@rajpatent.com		Work Product; Attorney/Client	Draft of Nextdoor state court complaint.
142	12/5/2011	Ashwin Anand <ashwin@rajpatent.com>	Raj Abhyanker <raj@rajpatent.com>			Work Product; Attorney/Client	Draft of Nextdoor state court complaint.
143	2013/2014	David R. Owens				Work Product	Nextdoor Proof chart
144	2013/2014	MP015096/Document drafted by Brian Orion				Work Product	A proof chart labeled Attorney Work Product on each page regarding Nextdoor's claims.
145							Non-responsive - Item removed because it relates to another legal matter.
146							Non-responsive - Item removed because it relates to another legal matter.
147	2013/2014	MP015096/Document drafted by Brian Orion				Work Product	Document is in a file on Brian Orion's Computer called Brian's Documents. Specifically, a Proof chart of the respective claims in this case.
148	7/31/2014	Bruno Tarabichi				Work Product	Document drafted by Bruno Tarabichi reflecting a response to a letter in this matter.
149	2013/2014	Bruno Tarabichi				Work Product	Document drafted by Bruno Tarabichi reflecting legal advice of counsel regarding draft filing.
150	2013/2014	Dad/Drafted by Brian Orion				Work Product	Document is in a file on Brian Orion's Computer called Brian's Documents. Specifically, draft RFPs.
151	2013/2014	Drafted by Abhyanker Counsel				Work Product	Document in a file on an RAPC computer of witness proof chart.
152							Produced August 3, 2014
153							Produced August 3, 2014
154							Produced August 3, 2014
155							Produced August 3, 2014
156							Produced August 3, 2014
157							Produced August 3, 2014
158							Produced August 3, 2014
159							Produced August 3, 2014
160							Produced August 3, 2014
161							Produced August 3, 2014
162	2013/2014 ?	MP015096/Document drafted by Brian Orion				Work Product	Document is in a file on Brian Orion's Computer called Brian's Documents. Specifically, a Proof chart of the respective claims in this case.
163	2013/2014 ?	MP015096/Document drafted by Brian Orion				Work Product	Document is in a file on Brian Orion's Computer called Brian's Documents. Specifically, a Proof chart of the respective claims in this case.
164	2013/2014 ?	MP015096/Document drafted by Brian Orion				Work Product	Document is in a file on Brian Orion's Computer called Brian's Documents. Specifically, a Proof chart of the respective claims in this case.
165	2013/2014 ?	MP015096/Document drafted by Brian Orion				Work Product	Document is in a file on Brian Orion's Computer called Brian's Documents. Specifically, a Proof chart of the respective claims in this case.
166	2013/2014 ?	MP015096/Document drafted by Brian Orion				Work Product	Document is in a file on Brian Orion's Computer called Brian's Documents. Specifically, a Proof chart of the respective claims in this case.
167	7/5/1905	MP015096/Document drafted by Brian Orion				Work Product	Document is in a file on Brian Orion's Computer called Brian's Documents. Specifically, a Proof chart of the respective claims in this case.
168	2013/2014 ?	MP015096/Document drafted by Brian Orion				Work Product	Document is in a file on Brian Orion's Computer called Brian's Documents. Specifically, a Proof chart of the respective claims in this case.
169							Produced August 3, 2014
170	7/31/2014	Bruno Tarabichi				Work Product	Document drafted by Bruno Tarabichi reflecting responding to a letter in this matter.
171	7/31/2014	Bruno Tarabichi				Work Product	Document drafted by Bruno Tarabichi reflecting responding to a letter in this matter.

172						Produced August 3, 2014
173						Produced August 3, 2014
174	2013/2014 ?	Bruno Tarabichi			Work Product	Document drafted by Bruno Tarabichi reflecting legal advice of counsel regarding draft filing.
175	2013/2014 ?	Bruno Tarabichi			Work Product	Document drafted by Bruno Tarabichi reflecting legal advice of counsel regarding draft filing.
176	2013/2014 ?	Bruno Tarabichi			Work Product	Document drafted by Bruno Tarabichi reflecting legal advice of counsel regarding draft filing.
177	2013/2014 ?	Dad/Drafted by Brian Orion			Work Product	Document is in a file on Brian Orion's Computer. Specifically, a Proof chart of the respective claims in this case.
178	2013/2014 ?	Abhyanker Legal Counsel			Work Product	Exhibit prepared by Abhyanker's legal team reflecting legal advice of counsel regarding draft filing.
179						Produced August 3, 2014
180						Produced August 3, 2014
181	2013/2014 ?	Ahmed Alhafidh/Drafted by Abhyanker counsel			Work Product	Document is a draft by Abhyanker counsel regarding a proof chart of claims in this case.
182	2013/2014 ?	H60sere/Drafted by Abhyanker legal team			Work Product	Document is in a file on Brian Orion's Computer. Specifically, proposed deposition questions in this matter.
183	2013/2014 ?	H60sere/Drafted by Abhyanker legal team			Work Product	Document is in a file on Brian Orion's Computer. Specifically, proposed deposition questions in this matter.
184	2013/2014 ?	Raj Abhyanker			Work Product	Document intended for Abhyanker's counsel regarding proposed deposition questions.
185	2013/2014 ?	Raj Abhyanker			Work Product	Document intended for Abhyanker's counsel regarding proposed declaration.
186						Produced August 3, 2014
187						Produced August 3, 2014
188	2013/2014 ?	Dad/Drafted by Abhyanker			Work Product	Document in a file on Raj Abhyanker's Computer of draft interrogatory responses intended for his attorneys' review.
189						Produced August 3, 2014
190	1/10/2014	Tre Kendrick/Prepared by Chance Tseng			Work Product	Document intended for Abhyanker counsel regarding a phone conversation of Raj Abhyanker counsel, Raj and an expert.
191	1/10/2014	Tre Kendrick/Prepared by Chance Tseng			Work Product	Document intended for Abhyanker counsel regarding a phone conversation of Raj Abhyanker counsel, Raj and an expert.
192	2013/2014	Dad/Drafted by Abhyanker			Work Product	Document in a file on Raj Abhyanker's Computer of draft interrogatory responses intended for his attorneys' review.
193						Produced August 3, 2014
194	2013/2014	H60sere/Drafted by Raj Abhyanker			Work Product	Document in a file on an RAPC computer, intended for Abhyanker counsel of a spread sheet for potential witnesses or parties relevant to the proceeding.
195						Produced August 3, 2014
196	2013/2014 ?	clientrelations/Drafted by Abhyanker			Work Product	File on RAPC computer intended for Abhyanker counsel regarding draft declaration.
197	10/17/2013	Bruno Tarabichi; Heather Norton; Roy Montgomery			Work Product	Draft pleading intended for this proceeding.
198	12/26/2013	Montgomery			Work Product	Draft pleading intended for this proceeding.
199	2013/2014 ?	Raj Abhyanker			Work Product	Statement intended for Abhyanker counsel regarding eDirectree
200	2013/2014 ?	RAPC 14 Raj Office/Drafted by Abhyanker			Work Product	Statement intended for Abhyanker counsel regarding proposed fact statement for pleading.
201	5/2/2014	RAPC 14 Raj Office/Drafted by Chance Tseng			Work Product	Document intended for Abhyanker counsel regarding a phone conversation of Raj Abhyanker and his counsel directed at the trade secret claims.
202	11/5/2011	Customer service <customer.service@trademarkia.com>/Draft ed by Raj Abhyanker			Attorney/Client	Draft email intended for Abhayanker counsel regarding Fatdoor v. Nextdoor.
203	11/5/2011	Customer service <customer.service@trademarkia.com>/Draft ed by Raj Abhyanker			Attorney/Client	Draft email intended for Abhayanker counsel regarding Fatdoor v. Nextdoor.
204	11/5/2011	Customer service <customer.service@trademarkia.com>/Draft ed by Raj Abhyanker			Attorney/Client	Draft email intended for Abhayanker counsel regarding Fatdoor v. Nextdoor.
205	11/5/2011	Customer service <customer.service@trademarkia.com>/Draft ed by Raj Abhyanker			Attorney/Client	Draft email intended for Abhayanker counsel regarding Fatdoor v. Nextdoor. Draft email intended for Abhayanker counsel regarding Fatdoor v. Nextdoor.
206	12/31/2011	Customer service <customer.service@trademarkia.com>/Draft ed by Raj Abhyanker			Work Product; Attorney/Client	Draft Email seeking legal advice of counsel regarding litigation strategy.
207	1/23/2014	Bruno Tarabichi Heather Norton, Roy Montgomery			Work Product	Draft pleading intended for this proceeding.
208	2013/2014 ?	Dad/Drafted by Abhyanker			Work Product	Document in a file on a RAPC computer of draft stipulation intended for his attorneys' review.
209	2013/2014 ?	Dad/Drafted by Abhyanker			Work Product	Document in a file on RAPC Computer of draft stipulation intended for his attorneys' review.
210	2013/2014 ?	Dad/Drafted by Abhyanker			Work Product	Document in a file on RAPC Computer of draft stipulation intended for his attorneys' review.
211	1/1/2012	Owner/Drafted by Lynn Terrebbonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint
212	1/1/2012	Owner/Drafted by Lynn Terrebbonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint
213						Produced August 3, 2014
214	1/1/2012	Owner/Drafted by Lynn Terrebbonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint
215						Produced August 3, 2014
216	1/1/2012	Owner/Drafted by Lynn Terrebbonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint

217	1/1/2012	Owner/Drafted by Lynn Terrebonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint
218	1/1/2012	Owner/Drafted by Lynn Terrebonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint
219	1/1/2012	Owner/Drafted by Lynn Terrebonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint
220	1/1/2012	Owner/Drafted by Lynn Terrebonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint
221	1/1/2012	Owner/Drafted by Lynn Terrebonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint
222	1/1/2012	Owner/Drafted by Lynn Terrebonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint
223	1/6/2011	Isra Abid			Work Product	Memorandum to Abhyanker regarding Abhyanker v. Benchmark potential claims.
224	11/1/2012	Raj Abhyanker			Work Product	Intended for Abhyanker counsel regarding pleadings.
225	12/6/2011	Owner/Drafted by Lynn Terrebonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint
226	1/1/2012	Owner/Drafted by Lynn Terrebonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint
227	1/1/2012	Owner/Drafted by Lynn Terrebonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint
228	1/1/2012	Owner/Drafted by Lynn Terrebonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint
229	1/1/2012	Owner/Drafted by Lynn Terrebonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint
230	11/1/2011	Owner/Drafted by Raj Abhyanker and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint
231 ?		Jacob M. Chapman			Work Product	Timeline of Nextdoor events.
232	1/1/2012	Owner/Drafted by Lynn Terrebonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint
233	2/20/2012	Ashwin Anand, Jacob Chapman, Stephen Kane (also attorney on this case at one point)			Work Product	Memorandum regarding case law relevant this case.
234	12/6/2011	Owner/Drafted by Lynn Terrebonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint
235	1/1/2012	Owner/Drafted by Lynn Terrebonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint
236	1/1/2012	Owner/Drafted by Lynn Terrebonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint
237	1/1/2012	Owner/Drafted by Lynn Terrebonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint
238	1/17/2012	Ashwin Anand and Chris Ditico both attorneys on the TTAB opposition			Work Product	Draft pleading for Nextdoor TTAB Opposition
239	1/17/2012	Ashwin Anand and Chris Ditico both attorneys on the TTAB opposition			Work Product	Draft pleading for Nextdoor TTAB Opposition
240	1/17/2012	Ashwin Anand and Chris Ditico both attorneys on the TTAB opposition			Work Product	Draft pleading for Nextdoor TTAB Opposition
241	12/6/2011	Owner/Drafted by Lynn Terrebonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint
242	12/6/2011	Owner/Drafted by Lynn Terrebonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint
243	1/6/2011	Isra Abid			Work Product	Memorandum to Abhyanker regarding Abhyanker v. Benchmark potential claims.
244 ?		Owner/Raj Abhayner			Work Product	Draft pleading intended for Abhyanker Counsel regarding TTAB complaint.
245	12/6/2011	Owner/Drafted by Lynn Terrebonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint
246	12/6/2011	Owner/Drafted by Lynn Terrebonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint
247	12/6/2011	Owner/Drafted by Lynn Terrebonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint
248	12/6/2011	Owner/Drafted by Lynn Terrebonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint
249	12/6/2011	Owner/Drafted by Lynn Terrebonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint
250	12/6/2011	Owner/Drafted by Lynn Terrebonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint
251	12/6/2011	Owner/Drafted by Lynn Terrebonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint
252						Produced August 3, 2014
253	3/27/2012	Ashwin Anand and Chris Ditico			Work Product	Draft pleading for Nextdoor TTAB Opposition
254	3/27/2012	Ashwin Anand and Chris Ditico			Work Product	Draft pleading for Nextdoor TTAB Opposition
255						Produced August 3, 2014
256						Produced August 3, 2014
257						Produced August 3, 2014
258	12/23/2011	RAPC 17 /Isra Abid			Work Product	Memorandum to Abhyanker regarding Abhyanker v. Benchmark potential claims.
259	12/6/2011	Owner/Drafted by Lynn Terrebonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint
260	12/6/2011	Owner/Drafted by Lynn Terrebonne and Ashwin Anand			Work Product	Draft pleading for Nextdoor state complaint

261	12/6/2011	Owner/Drafted by Lynn Terrebonne and Ashwin Anand				Work Product	Draft pleading for Nextdoor state complaint
262	12/6/2011	Owner/Drafted by Lynn Terrebonne and Ashwin Anand				Work Product	Draft pleading for Nextdoor state complaint
263		FRONT14/Raj Abhyanker Counsel				Work Product	Document intended for Abhyanker counsel regarding Facts and evidence in the matter
264	2011 ?	Owner/Christian Martinez, Ashwin Anand, Benjamin Ashurov				Work Product	Draft pleading for Nextdoor state complaint
265	2/9/2012	Ashwin Anand and Chris Ditico				Work Product	Draft pleading for Nextdoor TTAB Opposition
266	2/8/2012	Ashwin Anand and Chris Ditico				Work Product	Draft pleading for Nextdoor TTAB Opposition
267	1/1/2012	Owner/Drafted by Lynn Terrebonne and Ashwin Anand				Work Product	Draft pleading for Nextdoor state complaint
268	1/1/2012	Owner/Drafted by Lynn Terrebonne and Ashwin Anand				Work Product	Draft pleading for Nextdoor state complaint
269	1/1/2012	Owner/Drafted by Lynn Terrebonne and Ashwin Anand				Work Product	Draft pleading for Nextdoor state complaint
270							Produced August 3, 2014
271							Produced August 3, 2014
272	1/1/2012	Owner/Drafted by Lynn Terrebonne and Ashwin Anand				Work Product	Draft pleading for Nextdoor state complaint
273	1/1/2012	Owner/Drafted by Lynn Terrebonne and Ashwin Anand				Work Product	Draft pleading for Nextdoor state complaint
274	1/1/2012	Owner/Drafted by Lynn Terrebonne and Ashwin Anand				Work Product	Draft pleading for Nextdoor state complaint
275	3/29/2013	RAPC13/Raj Abhayanker				Work Product	Document of proposed admissions intended for Abhyanker counsel review.
276	3/29/2013	RAPC13/Raj Abhayanker				Work Product	Document of proposed admissions intended for Abhyanker counsel review.
277	3/29/2013	RAPC13/Raj Abhayanker				Work Product	Document of proposed admissions intended for Abhyanker counsel review.
278	3/29/2013	Dan Carlson/ Drafted by Abhyanker				Work Product	Document of proposed admissions intended for Abhyanker counsel review.
279	3/29/2013	RAPC13				Work Product	Document of proposed admissions intended for Abhyanker counsel review.
280	2013/2014	Roy Montgomery				Work Product	Proposed deposition questions
281							Produced August 3, 2014
282							Produced August 3, 2014
283							Non-responsive - Item removed because it relates to another legal matter.
284							Non-responsive - Item removed because it relates to another legal matter.
285	11/8/2013	Raj Abhyanker <raj@legalforcelaw.com>	bruno@legalforcelaw.com; heather@legalforcelaw.com; rteich@juno.com			Attorney/Client	Email with attachment seeking legal advice of counsel regarding litigation strategy.
286	11/8/2013	Raj Abhyanker <raj@legalforcelaw.com>	bruno@legalforcelaw.com; heather@legalforcelaw.com; rteich@juno.com			Attorney/Client	Email seeking legal advice of counsel regarding litigation strategy.

